

# Exhibit 1

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**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DIVISION, UTAH**

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SECURITY SYSTEMS, INC, individually  
and on behalf of all others similarly situated,

Plaintiff,

vs.

ALDER HOLDINGS LLC, and ALARM  
PROTECTION TECHNOLOGY, LLC

Defendants.

**AFFIDAVIT OF DAVID ROMAN**

Case No. 2:18-cv-00664 (CW)

Judge Clark Waddoups

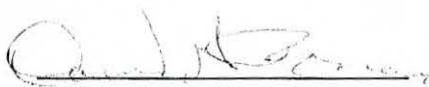
I, David Roman, of full age and under penalty of perjury, hereby state as follows:

1. I am a principal of Security Systems, Inc. (“SSI”).
2. I am fully familiar with and have personal knowledge of the facts and circumstances set forth herein and submit this affidavit in opposition to Defendant’s Rule 12(b)(6) Motion to Dismiss.
3. SSI is a Connecticut corporation that sells, services, and monitors residential and commercial security alarm systems throughout the United States.
4. In or around 2017, SSI customers began reporting that they had cancelled their contracts with SSI after having been informed by representatives from Alder Protection Technology, LLC (“APT”) that, among other things, SSI no longer serviced their residential area, that SSI had gone out of business, that SSI had assigned their account to APT, or that SSI could not adequately monitor their alarm.

5. SSI documented these reports, which reflected that APT had fraudulently taken over at least 38 SSI customer accounts in at least 8 states (Alabama, Texas, Louisiana, Tennessee, Arkansas, Florida, Georgia, and Mississippi).
6. These reports contain the name, address, and customer account number of the customers whose accounts were fraudulently taken over by APT. For certain customers these reports also reflect the manner in which APT induced the customer to cancel his or her contract with SSI.
7. APT representatives deceptively poached SSI customers “GI” in Boyton Beach, Florida, “JM” of Columbus, Georgia, and “SH” of Conroe, Texas, among others. By way of example, an APT employee misrepresented to “CM” of Laurel, Mississippi that SSI had gone out of business and APT induced her to cancel her SSI contract.
8. SSI’s documentation also reflects that an SSI customer, “MT”, from Albany, Georgia, had a letter, dated November 20, 2016 written on her behalf to the Georgia Department of Law, Consumer Protection Unit regarding misconduct by APT. SSI is in possession of that letter which reports that MT had been an SSI customer since July 2013. In September 2016, an APT representative apparently visited MT and told her that APT had purchased or merged with SSI and that APT was going to upgrade her alarm system. The APT representative then proceeded to uninstall the SSI security equipment and install APT equipment in its place. This caused MT to be double-billed for security services by both SSI and APT. APT apparently refused to allow MT to cancel her contract and continued to bill her for the alarm monitoring.

9. SSI has been a leader in the home security industry for more than 20 years, and as such we take customer privacy very seriously. For that reason, we did not want the identities of the specific customers that APT targeted to be publicly disclosed in the Complaint.
10. The customer reports described above are examples of the information that SSI has received regarding APT's efforts to deceive and mislead SSI customers and take over their accounts. SSI is in possession of additional information regarding APT's misconduct. That information includes, but is not limited to, additional customer reports, as well as a report by Inside Edition (annexed hereto as Exhibit A) which describes APT's training program and how it teaches APT representatives to use the deceptive practices described in the Complaint.

DATED:



David Roman

Subscribed and sworn to before me this 20<sup>th</sup> day of November, 2018.



Notary Public

My commission expires: 12/31/2020